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11 Attorneys for Defendant  
12 STARR SURPLUS LINES INSURANCE  
13 COMPANY

14 **UNITED STATES DISTRICT COURT**

15 **SOUTHERN DISTRICT OF CALIFORNIA**

16

17 TRI-UNION SEAFOODS, LLC,

18 Plaintiff,

19 v.

20 STARR SURPLUS LINES INSURANCE  
21 COMPANY,

22 Defendant.

23 CASE NO. 14-cv-2282-MMA-MDD

24 **JOINT NOTICE OF SETTLEMENT IN  
25 PRINCIPLE AND JOINT MOTION TO  
26 STAY PROCEEDINGS**

27 Judge: Hon. Michael M. Anello  
28 Location: Courtroom 3A (Schwartz)

Judge: Hon. Michael M. Anello  
Location: Courtroom 3A (Schwartz)

Magistrate: Hon. Mitchell D. Dembin  
Location: 11th Floor (Annex)

**JOINT NOTICE OF SETTLEMENT IN PRINCIPLE  
AND JOINT MOTION TO STAY PROCEEDINGS**

TO THE HONORABLE COURT:

4 PLEASE TAKE NOTICE THAT Plaintiff Tri-Union Seafoods, LLC ("Tri-Union") and  
5 Defendant Starr Surplus Lines Insurance Company ("Starr") (collectively, "Parties") have reached  
6 a settlement in principle of their disputes that are the subject of this action;

WHEREAS, the Parties have been engaged in settlement discussions;

8        WHEREAS, through those discussions, the Parties have reached a settlement in principle  
9 of their disputes that are the subject of this action, subject to agreement upon final terms, and have  
10 paused their discovery efforts; and

11 WHEREAS, the Parties wish to avoid burdening the Court and its staff and incurring  
12 expenses in this litigation while the Parties continue to discuss settlement-related issues.

13       Based on the foregoing, the Parties hereby jointly request that the Court stay the  
14 proceedings in this action through and including January 15, 2016, and in connection therewith,  
15 the Parties hereby jointly request that the Court take the December 18, 2015 Mandatory Settlement  
16 Conference ("MSC") and all related deadlines off calendar.

17 Good cause exists for the requested stay, including taking the MSC and all related  
18 deadlines off calendar. The Parties expect to finalize a settlement of their disputes that are the  
19 subject of this action within approximately the next month, and wish to avoid unnecessary  
20 expenditure of resources in connection with this litigation while they focus their efforts on  
21 attempting to finalize such a settlement.

22 This Joint Motion to Stay Proceedings is unopposed and no party will be prejudiced by the  
23 relief requested herein.

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1 WHEREFORE, the Parties respectfully request that the Court grant this Joint Motion to  
2 Stay Proceedings as set forth above.

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4 DATED: December 3, 2015

HANSON BRIDGETT LLP

5 By: /s/ Miles C. Holden  
6 WALTER R. SCHNEIDER  
7 MILES C. HOLDEN  
8 HANI GANJI  
9 CANDICE P. SHIH  
10 Attorneys for Plaintiff TRI-UNION SEAFOODS,  
11 LLC,

12 DATED: December 3, 2015

13 WILSON, ELSE, MOSKOWITZ, EDELMAN &  
14 DICKER LLP

15 By: /s/ Elayna M. Fiene (authorized 12/3/15)  
16 JOHN R. CLIFFORD  
17 JOSEPH F. BERMUDEZ  
18 JESSICA C. COLLIER  
19 ELAYNA M. FIENE  
20 Attorneys for Defendant STARR SURPLUS  
21 LINES INSURANCE COMPANY